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April 1, 2025

Via ECF

Hon. Allyne R. Ross
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 10007

Re: *United States v. Taesung Kim*
Docket No. 1:23-cr-00191-ARR

Dear Judge Ross:

As Your Honor is aware, I represent Mr. Kim, who was originally arraigned in this matter on May 2, 2023, and released on bail conditions which included a secured bond, and customary travel restrictions. To date, Mr. Kim has been fully compliant with his terms of release.

In February, 2025, Your Honor granted our request to modify Kim's standard travel limitations to allow him to travel to Connecticut for work related purposes in the month of March. Mr. Kim still has a need to travel to Connecticut for employment purposes during the month of April. Moreover, I have been advised that Kim's residence is located approximately two miles from the Connecticut state border. With this, I write to respectfully request that Kim's travel limitations be modified so as to allow him to generally travel within the state of Connecticut.

I have conferred with AUSA Patrick J. Campbell, who offers his consent to this application.

Thank you for your consideration.

Very truly yours,

/s/ Kevin J. Keating

KEVIN J. KEATING

KJK/dg

cc: AUSA Patrick J. Campbell